

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

B.P., et al.,

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

**CITY OF JOHNSON CITY,
TENNESSEE, et al.,**

Defendants.

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DECLARATION OF VANESSA BAEHR-JONES

I, VANESSA BAEHR-JONES, declare under penalty of perjury that the foregoing is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the foregoing matter and could, and would, testify competently thereto under penalty of perjury.
2. I am lead counsel for Plaintiffs B.P., et al., in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 281715) and admitted to appear *pro hac vice* in this District.
3. In August 2023, I learned from speaking with Department of Justice Trial Attorney Julie Pfluger and FBI Special Agent Paul Durant that videos and/or images depicting the sexual assaults by Williams of Females 9 and 12 are in the custody of law enforcement. I provided this information to my clients. Additionally, Female 8 learned from law

enforcement in or around August 2023 that images and/or videos of her sexual assault by Williams were in the custody of law enforcement.

4. Defendant Johnson City produced a privilege log, updated on April 25, 2024, which contained an entry for June 12-13, 2023: “Email thread between Investigator Toma Sparks and First Judicial District Attorney General Office Investigator Mike Little – subject ‘[EXTERNAL] Identified Victims.’ ” Counsel for the City have withheld this email in discovery, claiming the District Attorney is asserting investigatory privilege, and Plaintiffs still have not received a copy.
5. I have suggested to defense counsel that the parties submit a joint *Touhy* request seeking information from the FBI relevant to this litigation. Defendants have taken no steps to prepare or submit a *Touhy* request, to my knowledge. Nor have Defendants issued a subpoena for Inv. Michael Little’s testimony nor attempted to obtain additional discovery from other law enforcement agencies, to my knowledge.
6. Defendant City has produced video recordings of JCPD’s interviews of Female 8 and Female 12, as well as documentation, including police reports and written victim statements, showing that they reported their sexual assaults to JCPD.
7. I have stated on more than one occasion to counsel for Defendants that Plaintiffs do not intend to call Female 12 as a witness at trial.

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This document was executed in Oakland, California. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and based upon my own personal knowledge, and that if called upon to testify, I could verify the accuracy of the same.

This is the 24th day of July 2024.

/s/ Vanessa Baehr-Jones
VANESSA BAEHR-JONES

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on July 24, 2024 to counsel of record:

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/s Vanessa Baehr-Jones

Vanessa Baehr-Jones